

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:18-cv-01061-RC**

PROPERTY OF THE PEOPLE, INC. et al v. DEPARTMENT
OF JUSTICE

Assigned to: Judge Rudolph Contreras
Cause: 05:552 Freedom of Information Act

Date Filed: 05/04/2018

Jury Demand: None

Nature of Suit: 895 Freedom of
Information Act

Jurisdiction: U.S. Government Defendant

Plaintiff

PROPERTY OF THE PEOPLE, INC.

represented by **Jeffrey Louis Light**
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ATTORNEY TO BE NOTICED

Plaintiff

RYAN NOAH SHAPIRO

represented by **Jeffrey Louis Light**
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V.

Defendant

DEPARTMENT OF JUSTICE

represented by **Brenda A. Gonzalez**
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Date Filed	#	Docket Text
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05/04/2018	<u>1</u>	COMPLAINT against DEPARTMENT OF JUSTICE (Filing fee \$ 400 receipt number 0090-5464061) filed by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Summons)(Light, Jeffrey) (Entered: 05/04/2018)
05/04/2018	<u>2</u>	LCvR 7.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by PROPERTY OF THE PEOPLE, INC. (Light, Jeffrey) (Entered: 05/04/2018)
05/04/2018		Case Assigned to Judge Rudolph Contreras. (zsth) (Entered: 05/07/2018)
05/07/2018	<u>3</u>	SUMMONS (3) Issued Electronically as to DEPARTMENT OF JUSTICE, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Notice and Consent)(zsth) (Entered: 05/07/2018)
05/10/2018	<u>4</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 5/9/18., RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. DEPARTMENT OF JUSTICE served on 5/9/2018, RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 5/9/2018. (Answer due for ALL FEDERAL DEFENDANTS by 6/8/2018.) (Light, Jeffrey) (Entered: 05/10/2018)
06/08/2018	<u>5</u>	ANSWER to Complaint by DEPARTMENT OF JUSTICE.(Braswell, Marina) (Entered: 06/08/2018)
06/12/2018		MINUTE ORDER: It is hereby ORDERED that the parties shall meet, confer, and jointly submit a proposed briefing schedule by June 26, 2018. SO ORDERED. Signed by Judge Rudolph Contreras on 06/12/2018. (lcrc1) (Entered: 06/12/2018)
06/12/2018		Set/Reset Deadlines: Proposed Briefing Schedule due by 6/26/2018 (tj) (Entered: 06/12/2018)
06/26/2018	<u>6</u>	Joint Proposed Briefing Schedule by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO. (Light, Jeffrey) Modified on 6/27/2018 to correct docket text (jf). (Entered: 06/26/2018)
06/26/2018		MINUTE ORDER granting <u>6</u> Joint Proposed Briefing Schedule: It is hereby ORDERED that Defendant will file any motion to stay by August 1, 2018; Plaintiffs will file their opposition by September 5, 2018; and Defendant will file its reply by September 21, 2018. SO ORDERED. Signed by Judge Rudolph Contreras on 06/26/2018. (lcrc1) (Entered: 06/26/2018)
06/27/2018		Set/Reset Deadlines: Motions due by 8/1/2018. Responses due by 9/5/2018 Replies due by 9/21/2018. (tj) (Entered: 06/27/2018)
07/31/2018	<u>7</u>	Unopposed MOTION for Extension of Time to File <i>Motion to Stay</i> by DEPARTMENT OF JUSTICE (Braswell, Marina) (Entered: 07/31/2018)
07/31/2018		MINUTE ORDER granting <u>7</u> Unopposed Motion for Extension of Time: It is hereby ORDERED that on or before August 14, 2018, Defendant will file its motion to stay; on or before September 21, 2018, Plaintiffs will file their opposition to the motion to stay; and on or before October 12, 2018, Defendant will file its reply. SO ORDERED. Signed by Judge Rudolph Contreras on 07/31/2018. (lcrc1) (Entered: 07/31/2018)
08/01/2018		Set/Reset Deadlines: Defendant's Motion to Stay due by 8/14/2018. Response due by 9/21/2018 Reply due by 10/12/2018. (zs) (Entered: 08/01/2018)
08/14/2018	<u>8</u>	STATUS REPORT <i>in Lieu of Motion to Stay</i> by DEPARTMENT OF JUSTICE. (Braswell, Marina) (Entered: 08/14/2018)
08/15/2018		MINUTE ORDER: Upon consideration of <u>8</u> Defendant's Report to the Court, it is hereby ORDERED that the parties shall file a further joint status report on or before September 18, 2018. SO ORDERED. Signed by Judge Rudolph Contreras on 08/15/2018. (lcrc1) (Entered: 08/15/2018)
08/15/2018		Set/Reset Deadlines: Joint Status Report due by 9/17/2018 (hs) (Entered: 08/15/2018)

08/16/2018		Set/Reset Deadlines: Joint Status Report due by 9/18/2018 (hs) (Entered: 08/16/2018)
09/18/2018	<u>9</u>	Joint STATUS REPORT by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO. (Light, Jeffrey) (Entered: 09/18/2018)
09/18/2018		MINUTE ORDER: Upon consideration of <u>9</u> the parties' Joint Status Report, it is hereby ORDERED that the parties shall file a joint status report advising the Court further as to the status of this matter on or before December 14, 2018. SO ORDERED. Signed by Judge Rudolph Contreras on 9/18/18. (lcrc1) (Entered: 09/18/2018)
09/19/2018		Set/Reset Deadlines: Status Report due by 12/14/2018 (tj) (Entered: 09/19/2018)
09/19/2018		Set/Reset Deadlines: Status Report due by 12/14/2018 (tj) (Entered: 09/19/2018)
12/11/2018	<u>10</u>	Joint STATUS REPORT by DEPARTMENT OF JUSTICE. (Braswell, Marina) (Entered: 12/11/2018)
12/11/2018		MINUTE ORDER: Upon consideration of <u>10</u> the parties' Joint Status Report, it is hereby ORDERED that the parties shall file a joint status report advising the Court further as to the status of this matter on or before January 16, 2019. SO ORDERED. Signed by Judge Rudolph Contreras on 12/11/18. (lcrc1) (Entered: 12/11/2018)
12/13/2018		Set/Reset Deadlines: Status Report due by 1/16/2019 (tj) (Entered: 12/13/2018)
01/16/2019	<u>11</u>	Unopposed MOTION to Stay (<i>Defendant's Unopposed Motion to Stay Proceedings in Light of Lapse of Appropriations</i>) by DEPARTMENT OF JUSTICE (Attachments: # <u>1</u> Text of Proposed Order)(Braswell, Marina) (Entered: 01/16/2019)
01/24/2019		MINUTE ORDER granting <u>11</u> Motion to Stay: It is hereby ORDERED that this case is STAYED until the restoration of appropriations to the Department of Justice. It is FURTHER ORDERED that the joint status report previously due on January 16, 2019 shall be due 14 days after the restoration of appropriations. SO ORDERED. Signed by Judge Rudolph Contreras on 1/24/19. (lcrc1) (Entered: 01/24/2019)
02/07/2019	<u>12</u>	Joint STATUS REPORT by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO. (Light, Jeffrey) (Entered: 02/07/2019)
02/08/2019		MINUTE ORDER: Upon consideration of <u>12</u> the parties' Joint Status Report, it is hereby ORDERED that the parties shall file a joint status report advising the Court further as to the status of this matter on or before April 8, 2019. SO ORDERED. Signed by Judge Rudolph Contreras on 2/8/19. (lcrc1) (Entered: 02/08/2019)
03/01/2019		Set/Reset Deadlines: Status Report due by 4/8/2019 (tj) (Entered: 03/01/2019)
04/08/2019	<u>13</u>	Joint STATUS REPORT by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO. (Light, Jeffrey) (Entered: 04/08/2019)
04/08/2019		MINUTE ORDER: Upon consideration of <u>13</u> the parties' Joint Status Report, it is hereby ORDERED that, on or before May 20, 2019, the parties shall submit either a joint discovery plan or, if an agreement cannot be reached, separate plans for discovery. SO ORDERED. Signed by Judge Rudolph Contreras on 4/8/19. (lcrc1) (Entered: 04/08/2019)
04/11/2019		Set/Reset Deadlines: Joint Discovery Plan due 5/20/19. (tj) (Entered: 04/11/2019)
04/18/2019	<u>14</u>	ERRATA by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO <u>13</u> Status Report filed by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO. (Attachments: # <u>1</u> Exhibit Corrected Joint Status Report)(Light, Jeffrey) (Entered: 04/18/2019)
05/16/2019	<u>15</u>	Joint MOTION for Extension of Time to File <i>Discovery plan</i> by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO (Attachments: # <u>1</u> Text of Proposed Order)(Light, Jeffrey) (Entered: 05/16/2019)
05/17/2019		MINUTE ORDER granting <u>15</u> motion for extension of time: it is hereby ORDERED that, on or before May 28, 2019, the parties shall submit either a joint discovery plan or, if an agreement cannot be reached, separate plans for discovery. SO ORDERED. Signed by Judge Rudolph Contreras on 5/17/19. (lcrc1) (Entered: 05/17/2019)

05/21/2019		Set/Reset Deadlines: Joint Discovery plan due by 5/28/2019. (tj) (Entered: 05/21/2019)
05/28/2019	<u>16</u>	NOTICE of Proposed Order <i>and Discovery Plan</i> by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO re Order on Motion for Extension of Time to File, (Attachments: # <u>1</u> Text of Proposed Order)(Light, Jeffrey) (Entered: 05/28/2019)
05/28/2019	<u>17</u>	NOTICE of Defendant's Proposed Discovery Plan by DEPARTMENT OF JUSTICE (Braswell, Marina) (Entered: 05/28/2019)
05/31/2019		MINUTE ORDER: Upon consideration of the parties' <u>16</u> , <u>17</u> proposed discovery plans, it is hereby ORDERED that the following plan shall govern further proceedings in this case: the FBI shall provide the declaration Defendant describes in its filing, together with any documents supporting the assertions made therein, by July 1, 2019; Plaintiffs may take a 30(b)(6) deposition of the FBI on one or more of the topics Plaintiffs describe in their "scope of discovery" by July 30, 2019; and the parties shall meet, confer, and submit their respective positions on the necessity for any further discovery, and justification therefor, by August 29, 2019. SO ORDERED. Signed by Judge Rudolph Contreras on 5/31/19. (lcrc1) (Entered: 05/31/2019)
05/31/2019		Set/Reset Deadlines: Supplemental Memoranda due by 8/29/2019. (hs) (Entered: 05/31/2019)
06/29/2019	<u>18</u>	Unopposed MOTION for Extension of Time to <i>Comply in Part with the May 31, 2019 Order</i> by DEPARTMENT OF JUSTICE (Braswell, Marina) (Entered: 06/29/2019)
07/01/2019		MINUTE ORDER granting <u>18</u> motion for extension of time: it is hereby ORDERED that Defendant may have up to and including July 9, 2019 to provide Plaintiffs with the declaration ordered by this Court on May 31, 2019. SO ORDERED. Signed by Judge Rudolph Contreras on 7/1/19. (lcrc1) (Entered: 07/01/2019)
07/01/2019		Set/Reset Deadlines: declaration due by 7/9/2019. (tj) (Entered: 07/01/2019)
08/27/2019	<u>19</u>	Joint MOTION for Extension of Time to File <i>the parties' respective positions on the necessity for further discovery</i> by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO (Attachments: # <u>1</u> Text of Proposed Order)(Light, Jeffrey) (Entered: 08/27/2019)
08/28/2019		MINUTE ORDER granting <u>19</u> motion for extension of time: it is hereby that, on or before September 30, 2019, the parties shall submit their respective positions on the necessity for further discovery. SO ORDERED. Signed by Judge Rudolph Contreras on 8/28/19. (lcrc1) (Entered: 08/28/2019)
09/30/2019	<u>20</u>	RESPONSE TO ORDER OF THE COURT re Order on Motion for Extension of Time to File, filed by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO. (Light, Jeffrey) (Entered: 09/30/2019)
09/30/2019		MINUTE ORDER: Upon consideration of <u>20</u> the parties' joint response, it is hereby ORDERED that Plaintiffs are allowed to take one Fed. R. Civ. P. 31(a)(4) written deposition on or before November 26, 2019. It is further ORDERED that the parties shall submit their respective positions on the need for further discovery on or before December 10, 2019. SO ORDERED. Signed by Judge Rudolph Contreras on 09/30/2019. (lcrc1) (Entered: 09/30/2019)
11/26/2019	<u>21</u>	Joint MOTION to Modify <i>Court's order of September 30, 2019</i> by PROPERTY OF THE PEOPLE, INC., RYAN NOAH SHAPIRO (Attachments: # <u>1</u> Text of Proposed Order)(Light, Jeffrey) (Entered: 11/26/2019)
11/27/2019		MINUTE ORDER: Upon consideration of <u>21</u> the parties' Joint Motion to Modify Court's Order, it is hereby ORDERED that the motion is GRANTED. It is further ORDERED that Plaintiffs be allowed to take one Fed. R. Civ. P. 31(a)(4) written deposition on or before January 13, 2020. It is further ORDERED that Defendant may provide a written response under oath to Plaintiffs' questions in lieu of oral testimony. It is further ORDERED the parties shall submit their respective positions on the necessity for further discovery on or before January 27, 2020. SO ORDERED. Signed by Judge Rudolph Contreras on 11/27/2019. (lcrc1) (Entered: 11/27/2019)
01/13/2020	<u>22</u>	Unopposed MOTION for Extension of Time to File <i>Response/Reply to Plaintiffs' Deposition Written Questions</i> by DEPARTMENT OF JUSTICE (Braswell, Marina) (Entered: 01/13/2020)

01/13/2020		MINUTE ORDER granting <u>22</u> Defendant's Unopposed Motion for Extension of Time: It is hereby ORDERED that Defendant shall respond to Plaintiffs' Fed. R. Civ. P. 31(a)(4) written deposition questions on or before February 28, 2020. It is FURTHER ORDERED that, on or before March 13, 2020, the parties shall submit their respective positions on the need for any further discovery. SO ORDERED. Signed by Judge Rudolph Contreras on 1/13/2020. (lcrc1) (Entered: 01/13/2020)
01/14/2020		Set/Reset Deadlines: Responses due by 2/28/2020; Status Report due by 3/13/2020. (tj) (Entered: 01/14/2020)
03/11/2020	<u>23</u>	NOTICE OF SUBSTITUTION OF COUNSEL by Brenda A. Gonzalez on behalf of DEPARTMENT OF JUSTICE Substituting for attorney Marina Utgoff Braswell (Gonzalez, Brenda) (Entered: 03/11/2020)
03/13/2020	<u>24</u>	Response to Order of the Court <i>on the Need for Further Discovery</i> by DEPARTMENT OF JUSTICE. (Gonzalez, Brenda); Modified on event and text 3/16/2020 (ztth). (Entered: 03/13/2020)
03/13/2020		MINUTE ORDER: Upon consideration of <u>24</u> the parties' Joint Status Report on the Need for Further Discovery, it is hereby ORDERED that the parties shall file another joint status report on or before April 27, 2020. SO ORDERED. Signed by Judge Rudolph Contreras on 3/13/2020. (lcrc1) (Entered: 03/13/2020)
03/18/2020		Set/Reset Deadlines: Status Report due by 4/27/2020 (tj) (Entered: 03/18/2020)
04/27/2020	<u>25</u>	Joint STATUS REPORT by DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Declaration of David M. Hardy)(Gonzalez, Brenda) (Entered: 04/27/2020)
04/27/2020		MINUTE ORDER: Upon consideration of <u>25</u> the parties' joint status report, it is hereby ORDERED that the parties shall file another joint status report on or before May 4, 2020. SO ORDERED. Signed by Judge Rudolph Contreras on 4/27/2020. (lcrc1) (Entered: 04/27/2020)
04/27/2020		Set/Reset Deadlines: Status Report due by 5/4/2020 (tj) (Entered: 04/27/2020)
05/04/2020	<u>26</u>	Joint STATUS REPORT by DEPARTMENT OF JUSTICE. (Gonzalez, Brenda) (Entered: 05/04/2020)
05/04/2020		MINUTE ORDER: Upon consideration of <u>26</u> the parties' joint status report, it is hereby ORDERED that the parties shall file another joint status report on or before June 22, 2020. SO ORDERED. Signed by Judge Rudolph Contreras on 5/4/2020. (lcrc1) (Entered: 05/04/2020)
05/05/2020		Set/Reset Deadlines: Status Report due by 6/22/2020 (tj) (Entered: 05/05/2020)
06/22/2020	<u>27</u>	NOTICE of Appearance by Michael A. Tilghman on behalf of DEPARTMENT OF JUSTICE (Tilghman, Michael) (Entered: 06/22/2020)
06/22/2020	<u>28</u>	Joint STATUS REPORT by DEPARTMENT OF JUSTICE. (Tilghman, Michael) (Entered: 06/22/2020)
06/22/2020		MINUTE ORDER: Upon consideration of <u>28</u> the parties' joint status report, it is hereby ORDERED that, on or before June 29, 2020, the parties shall submit a proposed briefing schedule for cross-motions for summary judgment and Plaintiffs' anticipated motion for sanctions. SO ORDERED. Signed by Judge Rudolph Contreras on 6/22/2020. (lcrc1) (Entered: 06/22/2020)
06/23/2020		Set/Reset Deadlines: Proposed Briefing Schedule due by 6/29/2020 (tj) (Entered: 06/23/2020)
06/29/2020	<u>29</u>	NOTICE of Proposed Briefing Schedule by DEPARTMENT OF JUSTICE (Attachments: # <u>1</u> Text of Proposed Order)(Tilghman, Michael) (Entered: 06/29/2020)
06/29/2020		MINUTE ORDER adopting the proposal in <u>29</u> the parties' Joint Notice of Proposed Briefing Schedule: It is hereby ORDERED that the following schedule shall govern further proceedings in this case: Defendant shall file its motion for summary judgment on or before September 23, 2020; Plaintiffs shall file their cross-motion, opposition, and motion for sanctions on or before October 26, 2020; Defendant shall file its oppositions and reply on or before November 23, 2020; Plaintiffs shall file their replies on or before December 23, 2020. SO ORDERED. Signed by Judge Rudolph Contreras

		on 6/29/2020. (lcrc1) (Entered: 06/29/2020)
06/30/2020		Set/Reset Deadlines: Cross Motions due by 10/26/2020. Response to Cross Motions due by 11/23/2020. Reply to Cross Motions due by 12/23/2020. Summary Judgment motions due by 9/23/2020. Response to Motion for Summary Judgment due by 10/26/2020. Reply to Motion for Summary Judgment due by 11/23/2020. (tj) (Entered: 06/30/2020)